

September 21, 2018

VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Ex Parte Notice: Review of the Commission's Rules Governing the 896-901/935-940 MHz Band – WT Docket No. 17-200

Dear Ms. Dortch,

NextEra Energy, Inc. (“NextEra”), on behalf of itself and its subsidiary Florida Power & Light (“FPL”), continues to vigorously oppose the proposal by Enterprise Wireless Alliance and PDVWireless, Inc. (collectively “EWA/PDV”) to reconfigure the 896-901/935-940 MHz (“900 MHz”) band for broadband operations. FPL is the holder of numerous narrowband Business/Industrial/Land Transportation (“B/ILT”) wireless licenses in the 900 MHz band. The licenses are used for dispatch communications associated with electrical service restoration and maintenance including emergency notifications and disaster recovery communications after catastrophic events such as hurricanes; voice communications for nuclear power plant security operations required by federal regulations; nuclear siren system operations for public alerts; smart grid energy efficiency monitoring; and electric distribution system controls. Because such communications affect public safety and the safety of FPL employees and contractors, they need to be sufficiently robust to be operational 24 hours per day, seven days per week.

NextEra's opposition to the EWA/PDV proposal has been informed not only by the cost/benefit analysis it filed in this docket on September 14, 2018, which showed the costs greatly exceeded the benefits, but by sound spectrum management policy and engineering principles. With respect to the latter, NextEra attaches two spectrum engineering reports, one by its 900 MHz equipment vendor Harris Corporation and the other by an independent engineering consultant Gillespie, Prudhon & Associates, Inc. (“GP&A”).

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These reports explore the technical and cost impact issues of EWA/PDV's 900 MHz proposal, which include loss of coverage and increased costs for FPL's existing narrowband network due to:

- a. Compacting of all B/ILT narrowband users now spread across a 5 x 5 MHz band into a 1.85 x 1.85 MHz sub band;
- b. Interference from adjacent short-spaced narrowband 900 MHz channel assignments;
- c. Out of band emission ("OOBE") impacts into base and mobile receivers from broadband LTE transmitters;
- d. Geographical limitations on co-channel reuse;
- e. Insufficient interference protection threshold rules; and
- f. Lack of a guard band between broadband LTE and narrowband 900 MHz operations.

As these reports demonstrate, it may be impossible to duplicate FPL's current robust narrowband network under the EWA/PDV proposal; and it will be very costly in terms of transition expenses, interference, and reliability if FPL and other B/ILT narrowband users are forced into a compacted band. For these and other reasons addressed in its prior submissions in this proceeding, NextEra urges the Commission to not go forward with the EWA/PDV proposal. Pursuant to Section 1.1206 of the Commission's rules, we are filing an electronic copy of this letter and the attached report in the above-captioned docket.

Sincerely,

/s/_____
Bryan N. Tramont
Timothy J. Cooney

Enclosures